

# ELLIS:LAWHORNE

John J. Pringle, Jr.  
Direct dial: 803/343-1270  
[jpringle@ellislawhorne.com](mailto:jpringle@ellislawhorne.com)

May 11, 2006

**FILED ELECTRONICALLY AND FIRST-CLASS MAIL SERVICE**

The Honorable Charles L.A Terreni  
Chief Clerk  
**South Carolina Public Service Commission**  
Post Office Drawer 11649  
Columbia, South Carolina 29211

RE: USF Guidelines and Request for Expedited Relief  
**Docket No. 1997-239-C, ELS File No. 517-11367**

Dear Mr. Terreni:

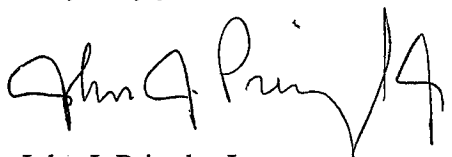
Enclosed is the **Response of the South Carolina Public Communications Association ("SCPCA") to Petition of Office of Regulatory Staff for an Order Clarifying USF Guidelines and Request for Expedited Relief** filed in the above-referenced matter.

Please acknowledge your receipt of this document by file-stamping the copy of this letter enclosed, and returning it in the enclosed envelope. By copy of this letter, I am serving all parties of record and enclose my certificate of service to that effect.

If you have any questions or need additional information, please do not hesitate to contact me.

With kind regards, I am

Very truly yours,



John J. Pringle, Jr.

JJP/cr  
cc: all parties of record  
Enclosures

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SUBMITTED TO THE COMMISSION IN ACCORDANCE WITH ITS  
ELECTRONIC FILING INSTRUCTIONS**

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 1997-239-C**

**IN RE:**

**INTRASTATE UNIVERSAL  
SERVICE FUND**

)  
)  
) **RESPONSE OF SOUTH CAROLINA**  
) **PUBLIC COMMUNICATIONS**  
) **ASSOCIATION TO PETITION OF OFFICE**  
) **OF REGULATORY STAFF FOR AN**  
) **ORDER CLARIFYING USF GUIDELINES**  
) **AND REQUEST FOR EXPEDITED RELIEF**  
)

**INTRODUCTION**

Pursuant to the Notices of April 4 and April 13, 2006, issued by the Public Service Commission of South Carolina (the "Commission") and 26 S.C. Regs., 103-837 and 103-841, the South Carolina Public Communications Association ("SCPCA") responds to the petition filed by the Office of Regulatory Staff ("ORS") on March 16, 2006 and the Motion of the ORS for Expedited Review filed on April 19, 2006.

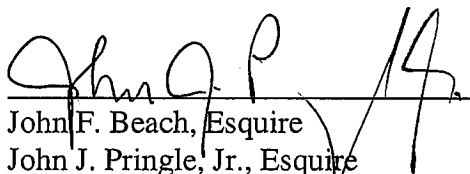
**THE SCPCA'S RESPONSE TO THE ORS**

The SCPCA appreciates ORS' attention to and involvement with the USF. Without waiving any positions the SCPCA may take in further proceedings in this Docket, the SCPCA believes ORS' request is appropriate. The SCPCA also agrees with the South Carolina Cable Television Association that it is an appropriate time for the Commission to take a close look at the USF. Among other concerns, the SCPCA wonders why payphone service providers ("PSPs") contribute to the USF, while many of the providers whose services compete with those offered by

PSPs have no such obligation. If the Commission is going to require PSPs to pay into the USF, it must ensure that the USF is administered in a non-discriminatory fashion so that PSPs are not unfairly burdened.

### CONCLUSION

The South Carolina Public Communications Association does not object to the Commission entering the declaratory order requested by the Office of Regulatory Staff, and requests that the Commission consider the Petition filed by the South Carolina Cable Television Association in a separate phase of this proceeding, and grant such other relief as is just and proper.

A handwritten signature in black ink, appearing to read "John J. Pringle, Jr.", is written over a horizontal line. To the right of the signature, the number "14" is written vertically.

John F. Beach, Esquire  
John J. Pringle, Jr., Esquire  
1501 Main Street, 5<sup>th</sup> Floor  
P.O. Box 2285  
Columbia, South Carolina 29202  
Telephone: (803) 779-0066  
Facsimile: (803) 799-8479

Attorneys for the South Carolina Public  
Communications Association

Columbia, South Carolina  
May 11, 2006

**IN RE:**

## CERTIFICATE OF SERVICE

Columbia, SC 29202

*Representing Office of Regulatory Staff*

Florence P. Belser  
Office of Regulatory Staff  
Post Office Box 11263  
Columbia, SC 29211

*Representing Southeastern Competitive Carriers Association*

Frank R. Ellerbe III  
Robinson, McFadden & Moore, P.C.  
Post Office Box 944  
Columbia, SC 29202

*Representing South Carolina Cable Television Association*

Frank R. Ellerbe III  
Robinson, McFadden & Moore, P.C.  
Post Office Box 944  
Columbia, SC 29202

*Representing AT&T Communications of the Southern States*

Gene V. Coker  
AT&T Communications of the Southern States, LLC  
AT&T-Law and Governmental Affairs  
1230 Peachtree Street, 4th Floor, Suite 4000  
Atlanta, GA 30309

*Representing Verizon Communications, Incorporated*

John M.S. Hoefer  
Willoughby & Hoefer, P.A.  
Post Office Box 8416  
Columbia, SC 29202-8416

*Representing Sprint Communications Company, L.P.*

Lori Reese Patton  
Womble Carlyle Sandridge & Rice, PLLC  
Counsel 301 S. College Street  
Suite 3500, One Wachovia Center  
Charlotte, NC 28202

*Representing SC Telephone Association & SC Telephone Coalition*

M. John Bowen Jr.  
McNair Law Firm, P.A.  
Post Office Box 11390  
Columbia, SC 29211

*Representing BellSouth Telecommunications, Inc.*

Patrick Turner  
BellSouth Telecommunications, Inc.  
Post Office Box 752  
Columbia, SC 29202

*Representing Alltel South Carolina, Incorporated*

Robert D. Coble  
Nexsen Pruet Adams Kleemeier, LLC  
Title: Counsel Post Office Drawer 2426  
Columbia, SC 29202

*Representing ITC DeltaCom Communications*

Robert E. Tyson Jr.  
Sowell Gray Stepp & Laffitte, LLC  
Post Office Box 11449  
Columbia, SC 29211

*Representing United Telephone & Sprint Communications*

Scott Elliott  
Elliott & Elliott, PA  
721 Olive Street  
Columbia, SC 29205

*Representing Verizon Communications, Incorporated*

Stan J. Bugner  
Verizon  
State Director/Regulatory & Government Affairs  
1301 Gervais Street, Suite 825  
Columbia, SC 29201

*Representing Verizon Communications, Incorporated*

Steven W. Hamm  
Richardson Plowden Carpenter & Robinson, P.A.  
P.O. Drawer 7788  
Columbia, SC 29202

*Representing Womens Shelter*

Susan B. Berkowitz  
Womens Shelter  
SC Appleseed Legal Justice Center  
P.O. Box 7187  
Columbia, SC 29202

*Representing United Telephone & Sprint Communications*

William R.L. Atkinson  
United Telephone & Sprint Communications  
3065 Cumberland Circle  
Mailstop GAATLD0602-612  
Atlanta, GA 30339

*Representing Sprint/United Telephone Company of the Carolinas*

Zel Gilbert  
Sprint  
1122 Lady Street, Suite 1050  
Columbia, SC 29201

  
Carol Roof

May 11, 2006  
Columbia, South Carolina